



February, 4 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

On behalf of Hometown Telecom, I am writing in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

The rapid growth of mobile data usage requires that additional capacity be put into the marketplace, and we support LightSquared in their efforts to bring their spectrum to market as a wholesale 4G LTE offering. Our country needs the capacity, but in addition to the simple capacity need, there is a greater need for an exclusively wholesale entity providing that capacity.

Most of the commercially deployed spectrum in the United States is in the hands of mobile network operators (MNOs) that have a large installed retail customer base. The primary interests of these MNOs is making sure that their networks can handle the current and future demands of their retail customers. Because there is scarcity now and because data usage is growing so rapidly, we are concerned that most of the deployed spectrum in the US will be reserved by MNOs to serve their own retail customer base.

The absence of a 4G entity exclusively focused on the wholesale market will mean that smaller telecom firms such as Hometown Telecom will find it difficult to negotiate commercial wholesale data agreements. If the only providers of wholesale data are companies that also offer retail data products, then competition and innovation will suffer. MNOs will always have a vested interest in supporting their own retail products first, either by not offering wholesale access to their networks or by pricing their wholesale data in a way that makes it difficult to compete against their own retail products.

The future of telecom is in data. For a company like ourselves, an independent wholesaler such as LightSquared is critical as communication transitions away from phone lines and moves onto VOIP and data platforms. Our primary service is international long distance. In a data driven world, international calling will not last as a standalone business. For Hometown to survive and succeed, we need to be able to offer our customers a bundled service that provides international calling and other value added services on top of a data plan.

By affirming LightSquared's rights as described in the Petition, the Commission would facilitate our ability to deliver the tangible benefits of more robust competition to consumers in the form of higher quality service, lower rates, and expanded voice and broadband service options.

At the same time, granting LightSquared's Petition would reinforce the integrity of the Commission's rules, and provide the regulatory certainty necessary for companies like Hometown Telecom and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit consumers. It bears emphasis that LightSquared's Petition does *not* ask the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, the Petition merely asks the Commission to affirm its *existing* legal and policy framework for spectrum licensing and usage rights, which (i) has been in place for decades; (ii) formed the basis for the technical standards developed cooperatively by LightSquared and the commercial GPS industry almost a decade ago; and (iii) has been relied upon by LightSquared and its investors, customers, and others throughout the implementation of the LightSquared network.

Hundreds of millions of American consumers would benefit from the greater competition that would be made possible by LightSquared's network—consistent with the objectives of the *National Broadband Plan*. Accordingly, I urge the Commission to grant LightSquared's Petition on an expedited basis.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Schofield', with a long, sweeping horizontal line extending to the right.

David Schofield
President
Hometown Telecom